

POLSINELLI PC
Morgan C. Fiander, Esq. (239812017)
600 Third Avenue, 42nd Floor
New York, New York 10016
Phone: (212) 413-2838
mfiander@polsinelli.com

Attorneys for Plaintiff CAF Borrower
GS LLC

CAF BORROWER GS LLC

Plaintiff,

v.

FRALEG GROUP INC., a New York
corporation; RENHAN LLC, a New Jersey
limited liability company and TAM LENDING
CENTER INC., a New Jersey corporation,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: ESSEX
COUNTY
DOCKET NO. SWC-F-001632-20

Civil Action

***REQUEST FOR ENTRY OF DEFAULT
AGAINST DEFENDANTS***

TO: CLERK OF THE SUPERIOR COURT OF NEW JERSEY

Please enter default against defendants FRALEG GROUP INC., RENHAN LLC, and
TAM LENDING CENTER INC. for failure to plead or otherwise defend as provided by the
Rules of Civil Practice of the Superior Court.

POLSINELLI PC
Attorneys for plaintiff CAF Borrower GS LLC

By: /s/ Morgan C. Fiander
MORGAN C. FIANDER

Dated: March 26, 2021

POLSINELLI PC
Morgan C. Fiander, Esq. (239812017)
600 Third Avenue, 42nd Floor
New York, New York 10016
Phone: (212) 413-2838
mfiander@polsinelli.com

Attorneys for Plaintiff CAF Borrower GS LLC

CAF BORROWER GS LLC

Plaintiff,

v.

FRALEG GROUP INC., a New York
corporation; RENHAN LLC, a New Jersey
limited liability company and TAM LENDING
CENTER INC., a New Jersey corporation,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: ESSEX COUNTY
DOCKET NO. SWC-F-001632-20

Civil Action

***CERTIFICATION OF MORGAN C.
FIANDER ESQ. IN SUPPORT OF
PLAINTIFF'S REQUEST FOR ENTRY OF
DEFAULT***

I, MORGAN C. FIANDER, ESQ., of full age, do hereby certify and say:

1. I am an attorney duly admitted to practice law in the State of New Jersey and an associate with the law firm POLSINELLI PC, attorneys for plaintiff CAF Borrower GS LLC ("Plaintiff"). I am responsible for litigating the above-captioned action on Plaintiff's behalf and have personal knowledge of the facts set forth herein.

2. I make this Certification in support of Plaintiff's request for entry of default against defendants FRALEG GROUP INC., RENHAN LLC and TAM LENDING CENTER INC. (collectively, the "Defendants").

3. On January 30, 2020, Plaintiff commenced this action by filing the Complaint in Foreclosure (the "Complaint") against Defendant Fraleg Group, Inc. ("Fraleg")

4. On July 13, 2020, an original Summons, together with copies of the Foreclosure Case Information Statement and the Complaint, were served on Fraleg. Copies of the Summons and the Affidavit of Service evidencing service of process on Fraleg are annexed hereto as **Exhibits A and B**. The original Affidavit of Service was filed on August 20, 2020.

5. Thereafter, Plaintiff filed its Amended Complaint in Foreclosure to Join Junior Mortgage Holders (the “**Amended Complaint**”) on September 17, 2020, and Defendants RENHAN LLC (“**Renhan**”) and TAM LENDING CENTER INC. (“**TAM**”) were added as additional Defendants to this action.

6. On September 23, 2020, an original Summons, together with copies of the Foreclosure Case Information Statement and the Amended Complaint, were served on Renhan. Copies of the Summons and the Affidavit of Service evidencing service of process on Renhan are annexed hereto as **Exhibits C and D**. The original Affidavit of Service was filed on November 20, 2020.

7. On September 23, 2020, an original Summons, together with copies of the Foreclosure Case Information Statement and the Amended Complaint, were served on TAM. Copies of the Summons and the Affidavit of Service evidencing service of process on TAM are annexed hereto as **Exhibits E and F**. The original Affidavit of Service was filed on November 20, 2020.

8. The Amended Complaint was also mailed to Fraleg on September 21, 2020.

9. As a result, Fraleg had until October 26, 2020, to answer or otherwise move with respect to the Amended Complaint, Renhan had until October 28, 2020, to answer or otherwise move with respect to the Amended Complaint, and TAM had until October 28, 2020, to answer or otherwise move with respect to the Amended Complaint

10. None of the Defendants, however, answered or otherwise moved with respect to the Complaint, and their time within which to do so has expired and has not been extended.

11. As a result, Plaintiff is entitled to the entry of default against Defendants.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Morgan C. Fiander
MORGAN C. FIANDER

Dated: March 26, 2021

AFFIDAVIT OF SERVICE

State of New Jersey

County of Essex

Superior Court

Case Number: SWC-F-001632-20

Plaintiff/Petitioner:

CAF BORROWER GS, LLC

vs.

Defendant/Respondent:

FRALEG GROUP, INC., a New York corporation

Received by HPS Process Service & Investigations to be served on **Fraleg Group, Inc., c/o VCorp Services, LLC, 820 Bear Tavern Road, West Trenton, NJ 08628**. I, Ted Cordasco, being duly sworn, depose and say that on the 13th day of July, 2020 at 2:49 p.m., executed service by delivering a true copy of the Summons; Complaint in Foreclosure; and Schedule A in accordance with state statutes in the manner marked below:

(☒) REGISTERED AGENT SERVICE: By serving Ebony Hill
as Intake Specialist @ VCorp Services, LLC for the above-named entity.

() RECORDS CUSTODIAN SERVICE: By serving _____
as _____ for the above-named entity.

() CORPORATE SERVICE: By serving _____
as _____ for the above-named entity.

() OTHER SERVICE: As described in the Comments below.

() NON SERVICE: For the reason detailed in the Comments below.

COMMENTS: _____

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 21st day
of July, 2020 by the affiant who is
personally known to me.

Carmen I. Molina
NOTARY PUBLIC

CARMEN I. MOLINA
NOTARY PUBLIC OF NEW JERSEY
Comm. # 2442741
My Commission Expires 2/6/2024

Ted Cordasco 7/21/2020
PROCESS SERVER # _____
Appointed in accordance with State Statutes

HPS Process Service & Investigations
www.hpsprocess.com
1669 Jefferson
Kansas City, MO 64108
(800) 796-9559

Our Job Serial Number: 2020012838
Ref: CAF Borrower GS v. Fraleg Group, Inc.

AFFIDAVIT OF SERVICE

State of New Jersey

County of Essex

Superior Court

Case Number: SWC-F-001632-20

Plaintiff/Petitioner:

CAF BORROWER GS, LLC

vs.

Defendant/Respondent:

FRALEG GROUP, INC., a New York corporation, et al.

Received by HPS Process Service & Investigations to be served on **Renhan, LLC, c/o Komlika Gill, Registered Agent, 1818 Old Cuthbert Road, Suite 100, Cherry Hill, NJ 08034**. I, STEPHEN WEISMAN, being duly sworn, depose and say that on the 23 day of SEPT, 2020 at 2:30 p.m., executed service by delivering a true copy of the Summons: Amended Complaint in Foreclosure to Join Junior Mortgage Holders; and Schedule A in accordance with state statutes in the manner marked below:

(☒) **REGISTERED AGENT SERVICE:** By serving KOMLIKA GILL
as REG. AGENT for the above-named entity.

() **RECORDS CUSTODIAN SERVICE:** By serving _____
as _____ for the above-named entity.

() **CORPORATE SERVICE:** By serving _____
as _____ for the above-named entity.

() **OTHER SERVICE:** As described in the Comments below.

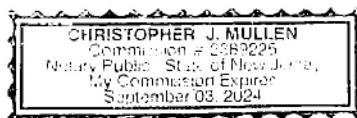
() **NON SERVICE:** For the reason detailed in the Comments below.

COMMENTS: GILL WAS EXTREMELY HOSTILE TO PROCESS SERVER

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 23 day
of SEPT 2020 by the affiant who is
personally known to me.

NOTARY PUBLIC



Stephen Weisman
PROCESS SERVER # _____
Appointed in accordance with State Statutes

HPS Process Service & Investigations
www.hpsprocess.com
1669 Jefferson
Kansas City, MO 64108
(800) 796-9559

Our Job Serial Number: 2020017651
Ref: 077441/645384

POLSINELLI PC

Jason A. Nagi (036452000)
600 Third Avenue, 42nd Floor
New York, New York 10016
Phone: (212) 684-0199
jnagi@polsinelli.com

Attorneys for Plaintiff CAF Borrower GS LLC

CAF BORROWER GS LLC,

Plaintiff,

v.

FRALEG GROUP INC., a New York corporation;
RENHAN LLC, a New Jersey limited liability
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New Jersey corporation,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: ESSEX COUNTY
DOCKET NO. SWC-F-001632-20

CIVIL ACTION

SUMMONS

FROM THE STATE OF NEW JERSEY, TO THE DEFENDANTS NAMED ABOVE:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it.

A directory of the addresses of each deputy clerk of the Superior Court is provided and available in the Civil Management Office in the county listed above or online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, New Jersey 08625-0971. A filing fee payable to the Treasurer, State of New

AFFIDAVIT OF SERVICE

State of New Jersey

County of Essex

Superior Court

Case Number: SWC-F-001632-20

Plaintiff/Petitioner:

CAF BORROWER GS, LLC

vs.

Defendant/Respondent:

FRALEG GROUP, INC., a New York corporation, et al.

Received by HPS Process Service & Investigations to be served on TAM Lending Center, Inc., c/o Phillip T. Valianti, Registered Agent, 131 Copperfield Drive, Woodbury, NJ 08096. I, Ronald Brown, being duly sworn, depose and say that on the 23 day of Sept, 2020 at 10:45am., executed service by delivering a true copy of the Summons; Amended Complaint in Foreclosure to Join Junior Mortgage Holders; and Schedule A in accordance with state statutes in the manner marked below:

() REGISTERED AGENT SERVICE: By serving _____
as _____ for the above-named entity.

() RECORDS CUSTODIAN SERVICE: By serving _____
as _____ for the above-named entity.

(X) CORPORATE SERVICE: By serving Philip T. Valianti
as Reg Agent for the above-named entity.

() OTHER SERVICE: As described in the Comments below.

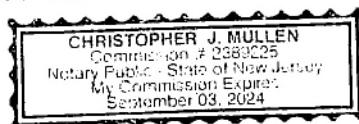
() NON SERVICE: For the reason detailed in the Comments below.

COMMENTS: Documents served at Mr. Valianti's office
251 S white Horse Pk
Audubon, NJ 08106

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 24 day
of Sept 2020 by the affiant who is
personally known to me.

NOTARY PUBLIC



Ronald Brown

PROCESS SERVER # _____
Appointed in accordance with State Statutes

HPS Process Service & Investigations
www.hpsprocess.com
1669 Jefferson
Kansas City, MO 64108
(800) 796-9559

Our Job Serial Number: 2020017652
Ref: 077441/645384

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Jason A. Nagi (036452000)
600 Third Avenue, 42nd Floor
New York, New York 10016
Phone: (212) 684-0199
jnagi@polsinelli.com

Attorneys for Plaintiff CAF Borrower GS LLC

CAF BORROWER GS LLC,

Plaintiff,

v.

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RENHAN LLC, a New Jersey limited liability
company and TAM LENDING CENTER INC., a
New Jersey corporation,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: ESSEX COUNTY
DOCKET NO. SWC-F-001632-20

CIVIL ACTION

SUMMONS

FROM THE STATE OF NEW JERSEY, TO THE DEFENDANTS NAMED ABOVE:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it.

A directory of the addresses of each deputy clerk of the Superior Court is provided and available in the Civil Management Office in the county listed above or online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, New Jersey 08625-0971. A filing fee payable to the Treasurer, State of New

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Attorneys for Plaintiff CAF Borrower GS LLC

CAF BORROWER GS LLC

Plaintiff,

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CENTER INC., a New Jersey corporation,

Defendants.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: ESSEX COUNTY
DOCKET NO. SWC-F-001632-20

Civil Action

CERTIFICATION OF SERVICE

I, MORGAN C. FIANDER, ESQ., of full age, do hereby certify and say:

1. I am an attorney duly admitted to practice law in the State of New Jersey and an associate with the firm Polsinelli PC, attorneys for plaintiff CAF Borrower GS LLC (“Plaintiff”). I am responsible for litigating the above-captioned action on Plaintiff’s behalf and have personal knowledge of the facts set forth herein. I am authorized to make the instant Certification on Plaintiff’s behalf in this case.

2. On March 26, 2021, I caused to be delivered a copy of the Request for Entry of Default, which was filed in this action on March 26, 2021, on defendants Fraleg Group Inc., Renhan LLC and TAM Lending Center, Inc. (collectively, the “Defendants”) via Certified Mail, Return Receipt Requested and U.S. Mail, to Defendants at the following last known addresses:

Fraleg Group, Inc.
c/o VCorp Services, LLC
820 Bear Tavern Road
West Trenton, New Jersey 08628

Renhan LLC
c/o Komlika Gill
1818 Old Cuthbert Road, Suite 100
Cherry Hill, New Jersey 08034

TAM Lending Center, Inc.
c/o Phillip T. Valianti
131 Copperfield Drive
Woodbury, New Jersey 08096

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/Morgan C. Fiander
MORGAN C. FIANDER

Dated: March 26, 2021